## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERIC
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Plaintiff,

CIVIL NO. 12-2039 (GAG)

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**COMMONWEALTH OF PUERTO RICO**, et al.,

Defendants.

## MOTION FOR BRIEF EXTENSION OF TIME TO FILE THE ELEVENTH SIXTH-MONTH REPORT UNDER PAR. 261

## TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and Puerto Rico Police Department ("Defendants" and/or "PRPB"), by and through the undersigned counsel, and respectfully state and request as follows:

- 1. The PRPB has been working on the preparation of its eleventh Par. 261 Sixth-Month Report ("Report"), despite the limitations and challenges resulting from Governor Wanda Vazquez-Garced's lockdown. An extension of time for filing had been requested and granted (Dkts. 1468 and 1470).
- 2. The Report is undergoing a final review for which a brief extension of time, until June 24, 2020, is needed.
- 3. In light of the Monitor's request for enlargement of time, until August 15<sup>th</sup>, 2020, to file its second Compliance Monitoring Report ("CMR-2") (Dkt. 1536),<sup>1</sup> the extension requested herein

<sup>&</sup>lt;sup>1</sup> The Monitor indicated in its Request for Enlargement of Time that an extension is requested "[i]n light of the events that have transpired during the last five months as it pertains to the Commonwealth's compliance with furnishing all sought information regarding the use of force..." The PRPB must clarify that all information requested on use of force in the first two information requests was submitted to the Monitor. The only pending use of force data is the one requested for the first time on June 3, 2020.

still allows the Monitor sufficient time to review prior to submitting the CMR-2 on or before August 15<sup>th</sup>, 2020, or as otherwise extended.

WHEREFORE, Defendants respectfully requests that the Court grant until June 24, 2020 to file the Report.

## RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 16th day of June, 2020.

By:

s/ Arturo J. Garcia Sola Arturo J. Garcia Sola USDC-PR No. 201903 ajg@mcvpr.com

s/Lizzie M. Portela Lizzie M. Portela USDC-PR No. 208401 lpf@mcvpr.com

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